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Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

THEODORE R. KORNREICH
REVOCABLE TRUST, Derivatively on
Behalf of Nominal Defendant KLA-
TENCOR CORPORATION,

Plaintiff,

vs.

EDWARD W. BARNHOLT; H.
RAYMOND BINGHAM; ROBERT J.
BOEHLKE; ROBERT T. BOND; GARY
E. DICKERSON; RICHARD J. ELKUS,
JR.; DENNIS J. FORTINO; JOHN H.
KISPert; KENNETH LEVY; ARTHUR
P. SCHNITZER, KENNETH L.
SCHROEDER; JON D. TOMPKINS; and
LIDA URBANEK,

Defendants.

-and-

KLA-TENCOR CORPORATION,

Nominal Defendant.

Case No. C-06-3345-JW

**STIPULATION [AND ~~PROPOSED~~]
ORDER CONTINUING INITIAL CASE
MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES**

WHEREAS, there are currently at least five derivative actions pending in the Northern District of California against nominal defendant KLA-Tencor Corporation ("KLA-Tencor"), as

well as some or all of the individual defendants named in this action, captioned as follows:

<u>Case Name</u>	<u>Case No.</u>	<u>Filing Date</u>
<i>Theodore R. Kornreich Revocable Trust v. Barnholt, et. al.</i>	06 3345 JW	May 22, 2006
<i>Ziolkowski v. Levy, et. al.</i>	06 3445 JW	May 26, 2006
<i>Ziering v. Levy, et al.</i>	06 3512 JW	May 31, 2006
<i>Alaska Electrical Pension Fund v. Levy, et. al.</i>	06 4002 JW	June 20, 2006
<i>Rabin v. Barnholt, et. al.</i>	06 4142 JW	July 3, 2006 (removed from state court)

WHEREAS, on June 16, 2006 and July 11, 2006, each of the cases listed above were ordered related and assigned to the Honorable James Ware;

WHEREAS, counsel for plaintiff in this action have filed a motion to consolidate each of the above cases, which is set for hearing on September 11, 2006;

WHEREAS, the May 22, 2006 Order Setting Initial Case Management Conference and ADR Deadlines in this case scheduled an Initial Case Management Conference for October 23, 2006, while all other Initial Case Management Conferences in the related cases are to be rescheduled pursuant to the orders relating those cases;

WHEREAS, defendants have sought and obtained extensions of time to respond to any consolidated complaint, and it is unlikely that any consolidated action will be at issue by October 23, 2006;

WHEREAS, Local Rule 16-2(e) requires Court approval of any stipulation to vary the date of a Case Management Conference;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for plaintiff and the defendants, as follows:

1. The Initial Case Management Conference currently set for October 23, 2006 will be continued to mid- to late-November, or thereafter, depending on the Court's availability. All other deadlines set forth in the May 22, 2006 Order Setting Initial Case Management Conference

1 and ADR deadlines are continued accordingly.

2 Dated: July_____, 2006

MORGAN, LEWIS & BOCKIUS LLP

3
4 By _____
5 Joseph E. Floren
6 Attorneys for Defendants

7 Dated: July _____, 2006

BORNSTEIN & BORNSTEIN

8
9 By _____
10 Jonathan H. Bornstein
11 Attorneys for THEODORE R.
12 KORNREICH REVOCABLE TRUST

13 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

14 The Initial Case Management Conference scheduled in this action for October 23, 2006 is
15 continued until November 20, 2006, at 10:00 a.m. All other deadlines set forth in the May 22, 2006
16 Order Setting Initial Case Management Conference and ADR deadlines are continued accordingly.

17
18 Dated: July 28, 2006

19 By  _____
20 Hon. James Ware